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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DONALD P. BOLAND and MARY A. BOLAND, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

VS.

GERDAU S.A., et al.,

Defendants.

Civil Action No. 1:16-cv-03925-LLS

CLASS ACTION

POLICEMEN'S ANNUITY AND BENEFIT FUND OF CHICAGO'S NOTICE OF MOTION AND MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that class member and proposed lead plaintiff Policemen's Annuity and Benefit Fund of Chicago ("Chicago Police"), will move this Court, on a date and at such time as may be designated by the Court, in Courtroom 21C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order: (1) appointing Chicago Police as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4, *et seq.*; and (2) approving Chicago Police's selection of Robbins Geller Rudman & Dowd LLP as lead counsel for the proposed class. In support of this Motion, Chicago Police submits the accompanying Memorandum of Law, the Declaration of David A. Rosenfeld and a [Proposed] Order.

DATED: July 25, 2016

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s/ David A. Rosenfeld DAVID A. ROSENFELD

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[Proposed] Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 25, 2016.

s/ David A. Rosenfeld
DAVID A. ROSENFELD

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Mailing Information for a Case 1:16-cv-03925-LLS Boland et al v. Gerdau S.A. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

• (No manual recipients)